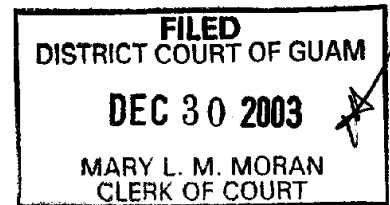


LAW OFFICES OF BRONZE & TANG

A Professional Corporation
BankPacific Building, 2nd Floor
825 South Marine Drive
Tamuning, Guam 96913
Telephone: (671) 646-2001
Facsimile: (671) 647-7671



***Attorneys for Defendant
Hongkong and Shanghai Banking Corporation, Ltd.***

DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,

Plaintiffs,

v.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD.,
et al.,

Defendants.

CIVIL CASE NO. 03-00036

MOTION TO DISMISS

Hongkong and Shanghai Banking Corporation, Ltd., ("HSBC") will move this Court to dismiss Plaintiffs Complaint. The motion will be based upon this motion, the memorandum points and authorities, the papers, records and files in this action, and upon such oral and documentary evidence as may be presented.

EXECUTED on this 30th day of December 2003.

**LAW OFFICES OF BRONZE & TANG
A Professional Corporation**

By: _____

JACQUES G. BRONZE
*Attorneys for Defendant
Hongkong and Shanghai Banking
Corporation, Ltd.*

ORIGINAL